



- d. Search 4: 4(a): First term shall include only “lifeguard”, not “parks OR dpr”; the parties shall meet and confer to narrow the terms to a manageable number (eg, 10 or so). 4(b): As is.
  - e. Search 5: Subsumed by Search 1; no need to run.
  - f. Search 6: Subsumed by Search 1; no need to run.
  - g. Search 7: Narrow consistent with comparator ruling in Search 1; the parties shall meet and confer about additional concerns, if any.
  - h. Shayvonne Nathaniel and Rehman shall be included as custodians.
  - i. The NYCC and PA individuals shall be custodians for only the term “Dalton.”
  - j. If the City obtains hit counts that it believes are overly burdensome to implement, and the parties cannot agree on further narrowing the search, the City may make an application to further limit terms but must support any such application with affidavits from persons with knowledge of the burdens imposed.
4. The City shall proceed expeditiously with producing documents it already had committed to produce prior to the conference.
5. The parties shall meet and confer about scheduling and shall submit any application to the Court by March 17, 2025.

The Clerk of Court is respectfully directed to terminate the letter motion at Dkt.

76.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'R. Lehrburger', with a long horizontal stroke extending to the right.

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ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Dated: March 3, 2025  
New York, New York

Copies transmitted this date to all counsel of record.